

**WARNER & SCHEUERMAN**  
**Attorneys at Law**  
**6 West 18th Street, 10th Floor**  
**New York, New York 10011**  
**Tel: (212) 924-7111**  
**Fax: (212) 924-6111**

**Jonathon D. Warner, Esq.**  
[jdwarner@wslaw.nyc](mailto:jdwarner@wslaw.nyc)

**Karl E. Scheuerman, Esq.**  
[kescheuerman@wslaw.nyc](mailto:kescheuerman@wslaw.nyc)

August 27, 2024

**Via ECF**

Pamela K. Chen, U.S.D.J.  
United States District Court, Eastern District of New York  
225 Cadman Plaza East, Courtroom 4F North  
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*  
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

In response to your Honor's Order dated August 27, 2024, such financial records of defendants Safa Gelardi, Vito Gelardi and IME Companions LLC were hand delivered to the EDNY Clerk's office for deposit in Your Honor's mailbox. All of the documents listed below, as well as the cover letter were served upon plaintiffs' attorneys via e-mail, as seen on the "cc" on defendants' letter dated August 26, 2024.

The below financial records were produced:

1. Mortgage Loan Statement dated August 13, 2024 for 26118 Crosswood Trails Lane, Cypress, Texas 77433.
2. Mortgage Loan Statement dated August 13, 2024 for 5265 Milford Road, East Stroudsburg, Pennsylvania 18302.
3. Mortgage Loan Statement dated August 12, 2024 for 9 Woods End Road, Lake Harmony, Pennsylvania 18624.
4. Mortgage Loan Statement dated August 9, 2024 for 148 Clay Pit Road, Staten Island, New York, 10309.
5. Purchase Money Mortgage Note & Rent to Buy Agreement for 148 Clay Pit Road dated March 1, 2024.

Pamela K. Chen, U.S.D.J.  
August 27, 2024

6. Chase Bank monthly statements from April 2023 through July 2024.

7. Evidence of IRS indebtedness.

8. 2022 Tax Returns

With respect to Berkeley Research Group, LLC, I have been advised that no agreement has been reached with respect to payment, but a \$500.00 wire transfer was initiated to BRG on August 25, 2024.

Respectfully,

*/s/ Jonathon D. Warner*

JDW/dlr

cc: Emanuel Kataev, Esq. via ECF  
Jamie Felsen, Esq. via ECF